



U.S. Department of Justice

United States Attorney
Eastern District of New York

SLT:GMP
F.#2010R01661
F.#2011R00272

271 Cadman Plaza East
Brooklyn, New York 11201

December 7, 2011

By Email and ECF

TO: Attached Counsel List

Re: United States v. Gjavit Thaqi et al.
Criminal Docket No. 11-486 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery with respect to the above-captioned case. All additional discovery will be provided to you on a rolling basis as it becomes available. The government also reiterates its request for reciprocal discovery.

The government hereby discloses consensually recorded surveillance video that was recorded from December 2010 through June 2011. The government furnished the surveillance video to First Choice Copy on DVDs. You can obtain these materials by contacting **Rudy Oliver at First Choice Copy, telephone number (718) 381-1480 and asking for print job number 60095.** Only counsel of record or someone from his or her office will be permitted to obtain these materials. Enclosed please find an index that provides the date, session time stamps and participants in the relevant video clips.

The government is not aware of any exculpatory material regarding the defendants at this time. The government understands and will comply with its continuing obligation to produce exculpatory material as defined by Brady v. Maryland, 373 U.S. 83 (1963), and its progeny.

If you have any questions or further requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH
United States Attorney
Eastern District of New York

By: /s/
Steven L. Tiscione
Michael L. Yaeger
Gina M. Parlovecchio
Assistant U.S. Attorneys
(718) 254-6317/6075/6228

cc: Clerk of Court (DLI) (via ECF)

Enclosure